

REMARKS

Claims 17-21 are pending in the application. In the final Office Action of August 8, 2005, the Examiner made the following disposition:

- A.) Rejected claims 17-18 and 20 under 35 U.S.C. §102(e) as being anticipated by *Eichelberger*.
- B.) Rejected claims 19 and 21 under 35 U.S.C. §103(a) as being unpatentable over *Eichelberger* in view of *Hudak, et al.*

Applicants respectfully traverse the rejections and addresses the Examiner's disposition below.

- A.) Rejection of claims 17-18 and 20 under 35 U.S.C. §102(e) as being anticipated by *Eichelberger*:

Applicants respectfully disagree with the rejection.

Independent claim 17, as amended, claims a method of fabrication of a semiconductor device. A plurality of semiconductor chips are die bonded on a substrate. A target mark is formed in the substrate and corresponds to the semiconductor chips. A first insulation film is formed on the substrate, wherein a top surface and at least a portion of side surfaces of the plurality of semiconductor chips are incrusted in the first insulation film. A second insulation film is formed directly on and contacts the first insulation film. The second insulation film is ground flat. A third insulation film is formed directly on and contacts the second insulation film. A connection hole is formed reaching a semiconductor chip of the plurality of semiconductor chips through the first insulation film, the second insulation film, and the third insulation film. Wiring is formed on the third insulation film, wherein the wiring is connected to the semiconductor chip through the connection hole.

This is clearly unlike *Eichelberger*, which fails to disclose or even suggest forming a target mark. *Eichelberger* fails to even discuss target marks. Therefore, for at least this reason, *Eichelberger* fails to disclose or suggest claim 17.

Further, *Eichelberger* fails to disclose or suggest forming a first, second, and third insulation layer with passing therethrough via a connection hole. Referring to *Eichelberger* Figure 6, *Eichelberger* discloses forming multiple insulation layers, however, *Eichelberger*'s wirings only pass through a single layer. Nowhere does *Eichelberger* disclose or suggest that a connection hole is formed through 3 insulation layers and a wiring is formed through the connection hole. Thus, for at least this additional reason, *Eichelberger* fails to disclose or suggest

claim 17.

Claims 18 and 20 depend directly or indirectly from claim 17 and are therefore allowable for at least the same reasons that claim 17 is allowable.

Claim 18's language has been amended to be consistent with the amendments made to claim 17.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

B.) Rejection of claims 19 and 21 under 35 U.S.C. §103(a) as being unpatentable over *Eichelberger* in view of *Hudak*:

Applicants respectfully disagree with the rejection.

Applicants' independent claim 17 is allowable over *Eichelberger* as discussed above. *Hudak* still fails to disclose or suggest forming a target mark. *Hudak* also fails to disclose or suggest forming a first, second, and third insulation layer with passing therethrough via a connection hole. Therefore, *Eichelberger* in view of *Hudak* still fails to disclose or suggest Applicants' claim 17.

Claims 19 and 21 depend directly or indirectly from claim 17 and are therefore allowable for at least the same reasons that claim 17 is allowable.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

CONCLUSION

In view of the foregoing, it is submitted that claims 17-21 are patentable. It is therefore submitted that the application is in condition for allowance. Notice to that effect is respectfully requested.

Respectfully submitted,

 (Reg. No. 45,034)
Christopher P. Rauch
SONNENSCHEIN, NATH & ROSENTHAL LLP
P.O. Box #061080
Wacker Drive Station - Sears Tower
Chicago, IL 60606-1080
Telephone 312/876-2606
Customer #26263
Attorneys for Applicant(s)

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited as First Class Mail in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450 on November 8, 2005.

 (Reg. No. 45,034)
Christopher P. Rauch